



298491



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

(217) 782-6760

THOMAS V. SKINNER, DIRECTOR

CERTIFIED MAIL

Z 416 152 200

June 28, 1999

Mr. Al Munn
Sundstrand Aerospace
Environmental Health and Safety
4747 Harrison Avenue
P.O. Box 7002
Rockford, Illinois 61125

Re: 2010300074 Winnebago County
Southeast Rockford Groundwater Contamination
RCRA Closure at 11th Street Facility
Superfund/Technical Reports

2010300048 Winnebago County
Sundstrand
ILD010219665
RCRA Closure

Dear Mr. Munn:

On Friday, April 30, 1999 a meeting was held between representatives of Sundstrand and Illinois Environmental Protection Agency's ("Illinois EPA's") Resource Conservation and Recovery Act ("RCRA") Corrective Action Unit. It is my understanding that the subject of the meeting was the completion of the RCRA closure of the former outdoor hazardous waste container storage area and associated underground storage tank located at the former Plant #2 at Sundstrand's 2421 11th Street facility (Illinois EPA Site I.D. No. 2010300048; U.S. EPA I.D. No. ILD010219665). Additionally, I believe in the past, Sundstrand has proposed to perform work at the former Plant #2 under the Site Remediation Program ("SRP").

As you know, Illinois EPA has been working to address volatile organic compound ("VOC") groundwater contamination in the Rockford area under the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended ("CERCLA") since 1984. In September 1995, Illinois EPA finalized a Record of Decision ("ROD") selecting a remedy for the groundwater contamination at the Southeast Rockford Superfund site. A primary component of the selected remedial action included future source control measures at the four identified major source areas contributing to the groundwater contamination at this site. The ROD identified "Area 9/10" as one of the four major source areas. Area 9/10 encompasses Sundstrand's 2421 11th Street facility which includes Plant #1 and the former Plant #2.

In continuing its efforts to address VOC contamination at the Southeast Rockford Superfund site under CERCLA, the Illinois EPA is currently working on the identification of an appropriate source control remedial action at Area 9/10. The Illinois EPA expects a Source Control ROD to be issued in December of 1999. The Illinois EPA is considering soil-vapor extraction and groundwater treatment involving air/steam injection with vacuum extraction for Area 9/10. Because Area 9/10 is considered a major source at a Superfund site, CERCLA 121(a) requires responsible parties or governmental agencies to select a remedial action through a ROD. Corrective action implemented outside of the CERCLA process would not meet the requirements set forth in Section 121(a) of CERCLA.

At this time, it appears that the only means by which Sundstrand could pursue remedial activities at Area 9/10 would be under a binding commitment with the U.S. EPA and the Illinois EPA, and within the confines of the CERCLA process. Illinois EPA and U.S. EPA would be willing to discuss the establishment of a binding commitment with Sundstrand after the Source Control ROD is finalized. Illinois EPA welcomes the opportunity to work with Sundstrand in the future investigation and planned remedial action of Area 9/10.

Additionally, it should be noted that soil and groundwater contamination that is **not** related to the Superfund site, could be addressed within the SRP. For example, Sundstrand could conduct remediation of contaminated source material and groundwater at the Sundstrand #6 Plant, or remediation at any source area identified as not having contributed to contamination related to the Superfund site.

If you have any questions please contact me at 217/524-1655 or Gerald E. Willman of my staff at 217/524-6365.

Sincerely,



William C. Child, Chief
Bureau of Land

cc: Russ Hart, U.S. EPA

bcc: Bill Child
Gary King
Terry Ayers
Paul Jagiello
Virginia Wood
Jerry Willman
Jim Moore
Sandra Bron
Bureau File